

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>In re:</b>	:	
	:	<b>Case No.: 18-11503</b>
<b>Arnold B. Sapp</b>	:	<b>Chapter 13</b>
	:	<b>Judge Ashely M. Chan</b>
<b>Debtor(s)</b>	:	<b>*****</b>
	:	
<b>Wells Fargo Bank, N.A.</b>	:	
	:	<b>Movant,</b>
<b>vs</b>	:	
	:	
<b>Arnold B. Sapp</b>	:	
	:	
<b>William C. Miller</b>	:	
<b>Respondents.</b>	:	

**WELLS FARGO BANK, N.A.'S NOTICE OF DEBTOR'S REQUEST FOR  
FORBEARANCE DUE TO THE COVID-19 PANDEMIC**

Wells Fargo Bank, N.A. ("Creditor") by and through undersigned counsel, hereby submits Notice to the Court of Arnold B. Sapp ("Debtor") request for mortgage payment forbearance based upon a material financial hardship caused by the COVID-19 pandemic.

The Debtor has requested a forbearance period of 3 months and has elected to not tender payments to Creditor that would have come due on the mortgage starting April 1, 2020 through June 1, 2020, and will resume payments beginning July 1, 2020. Creditor holds a secured interest in the real property commonly known as 47 Hidden Valley Road, Aston, PA 19014.

Creditor does not waive any rights to collect the payments that come due during the forbearance period. Debtor will be required to cure the delinquency created by the forbearance period. If Debtor fails to make arrangements to fully cure any arrears resulting from the

forbearance period, Creditor reserves the ability to seek relief from the automatic stay upon expiration of the forbearance period.

Respectfully submitted,

/s/ Karina Velter

Karina Velter, Esquire (94781)

Adam B. Hall (323867)

Sarah E. Barngrover (323972)

Manley Deas Kochalski LLC

P.O. Box 165028

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Attorneys for Creditor

The case attorney for this file is Karina Velter.

Contact email is [kvelter@manleydeas.com](mailto:kvelter@manleydeas.com)

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	:	<b>Debtor(s) : * * * * *</b>
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<b>Wells Fargo Bank, N.A.</b>	:	
	:	<b>Movant,</b>
<b>vs</b>	:	
	:	
<b>Arnold B. Sapp</b>	:	
	:	
<b>William C. Miller</b>	:	
	:	<b>Respondents.</b>

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing Wells Fargo Bank, N.A.'s Notice of Debtor's Request for Forbearance Due to the COVID-19 Pandemic was served on the parties listed below via e-mail notification:

Office of U.S. Trustee, Party of Interest, (Registered address)@usdoj.gov

William C. Miller, Chapter 13 Trustee, P.O. Box 1229, Philadelphia, PA 19105

David A. Scholl, Attorney for Arnold B. Sapp, 512 Hoffman Street, Philadelphia, PA 19148, judgescholl@gmail.com

The below listed parties were served via regular U.S. Mail, postage prepaid, on May 12, 2020:

Arnold B. Sapp, 47 Hidden Valley Road, Aston, PA 19014

DATE: 5/12/2020

/s/ Karina Velter

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